

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE**

UNITED HEALTHCARE SERVICES, INC.,
UNITEDHEALTHCARE INSURANCE
COMPANY, AND UMR, INC.,

Plaintiffs,

v.

TEAM HEALTH HOLDINGS, INC.,
AMERITEAM SERVICES, LLC, and HCFS
HEALTH CARE FINANCIAL SERVICES,
LLC,

Defendants.

Case No. 3:21-CV-00364-DCLC-JEM

**JOINT MOTION FOR ENTRY OF STIPULATED CONFIDENTIALITY AND
PROTECTIVE ORDER**

Plaintiffs United Healthcare Services, Inc., UnitedHealthcare Insurance Company, and UMR, Inc. and Defendants Team Health Holdings, Inc., Ameriteam Services, LLC, and HCFS Health Care Financial Services, LLC have conferred and agreed upon the terms of a Stipulated Confidentiality and Protective Order to govern material shared during discovery in this matter. In support of this motion, the Parties would show that the terms of the attached protective order are required to protect trade secrets and confidential commercial, financial, or other private and proprietary information, the disclosure of which would risk substantial harm to the producing party. As such, the Parties respectfully request that the Court enter the Stipulated Confidentiality and Protective Order, attached hereto as Exhibit A.

Respectfully submitted,

Dated: November 22, 2022.

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CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2022, I caused the foregoing to be filed with the Court by the electronic filing system, which will send a copy electronically to all counsel of record.

/s/ Kendell G. Vonckx